

09-1.3-06

A.F. 22W

PTO/SB/21 (09-04)

Approved for use through 07/31/2006. OMB 0651-0031

U.S. Patent and Trademark Office: U.S. DEPARTMENT OF COMMERCE

Under the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number.

TRANSMITTAL FORM (to be used for all correspondence after initial filing)	Application Number	10/666,742	
	Filing Date	September 19, 2003	
	First Named Inventor	Wood et al.	
	Art Unit	2812	
	Examiner Name	A. Ghyka	
Total Number of Pages in This Submission	7	Attorney Docket Number	2269-6095US (03-0593.00/US)

ENCLOSURES (check all that apply)		
<input type="checkbox"/> Fee Transmittal Form <input type="checkbox"/> Fee Attached <input type="checkbox"/> Amendment / Reply <input type="checkbox"/> After Final <input type="checkbox"/> Affidavits/declaration(s) <input type="checkbox"/> Extension of Time Request <input type="checkbox"/> Express Abandonment Request <input type="checkbox"/> Information Disclosure Statement <input type="checkbox"/> Certified Copy of Priority Document(s) <input type="checkbox"/> Reply to Missing Parts/ Incomplete Application <input type="checkbox"/> Reply to Missing Parts under 37 CFR 1.52 or 1.53	<input type="checkbox"/> Drawing(s) <input type="checkbox"/> Licensing-related Papers <input type="checkbox"/> Petition <input type="checkbox"/> Petition to Convert to a Provisional Application <input type="checkbox"/> Power of Attorney, Revocation Change of Correspondence Address <input type="checkbox"/> Terminal Disclaimer <input type="checkbox"/> Request for Refund <input type="checkbox"/> CD, Number of CD(s) ____ <input type="checkbox"/> Landscape Table on CD	<input type="checkbox"/> After Allowance Communication to TC <input type="checkbox"/> Appeal Communication to Board of Appeals and Interferences <input checked="" type="checkbox"/> Reply Brief <input type="checkbox"/> Proprietary Information <input type="checkbox"/> Status Letter <input type="checkbox"/> Other Enclosure(s) (please identify below):
Remarks The Commissioner is authorized to charge any additional fees required but not submitted with any document or request requiring fee payment under 37 C.F.R. §§ 1.16 and 1.17 to Deposit Account 20-1469 during pendency of this application.		

SIGNATURE OF APPLICANT, ATTORNEY, OR AGENT			
Firm	TraskBritt, P.C.		
Signature			
Printed Name	Brick G. Power		
Date	September 12, 2006	Reg. No.	38,581

CERTIFICATE OF MAILING	
Express Mail Label Number: <u>EV827470248US</u>	
Date of Deposit: <u>September 12, 2006</u>	
Person Making Deposit: <u>Brett Hooke</u>	

This collection of information is required by 37 CFR 1.5. The information is required to obtain or retain a benefit by the public which is to file (and by the USPTO to process) an application. Confidentiality is governed by 35 U.S.C. 122 and 37 CFR 1.11 and 1.14. This collection is estimated to 12 minutes to complete, including gathering, preparing, and submitting the completed application form to the USPTO. Time will vary depending upon the individual case. Any comments on the amount of time you require to complete this form and/or suggestions for reducing this burden, should be sent to the Chief Information Officer, U.S. Patent and Trademark Office, U.S. Department of Commerce, P.O. Box 1450, Alexandria, VA 22313-1450. DO NOT SEND FEES OR COMPLETED FORMS TO THIS ADDRESS. SEND TO: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

If you need assistance in completing the form, call 1-800-PTO-9199 and select option 2.



PATENT

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

In re Application of:

Wood et al.

Serial No.: 10/666,742

Filed: September 19, 2003

For: METHODS FOR THINNING
SEMICONDUCTOR SUBSTRATES THAT
EMPLOY SUPPORT STRUCTURES
FORMED ON THE SUBSTRATES
(Amended)

Confirmation No.: 6057

Examiner: A. Ghyka

Group Art Unit: 2812

Attorney Docket No.: 2269-6095US

NOTICE OF EXPRESS MAILING

Express Mail Mailing Label Number: EV827470248US

Date of Deposit with USPS: September 12, 2006

Person making Deposit: Brett Hooke

REPLY BRIEF

Mail Stop Appeal Brief – Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

This Reply Brief follows the Examiner's Answer of July 12, 2006, is being filed within two months of the mailing date of the Examiner's Answer, and is being submitted in accordance with the requirements of 37 C.F.R. § 41.41.

VII. ARGUMENT

A. REJECTIONS UNDER 35 U.S.C. § 102

3. ANALYSIS

Claims 17-20 have been rejected under 35 U.S.C. § 102(b) for reciting subject matter that is allegedly anticipated by the subject matter described in Leedy.

Independent claim 17 is directed to a method that includes “*forming* a support structure on an *active* surface of the semiconductor substrate . . .”

It has been asserted in the Examiner’s Answer that the placement and bonding of a preformed frame or ring 19 onto the active surface of a substrate 10 amounts to “forming” the frame or ring 19 on the active surface. In support of this assertion, the Examiner has proffered the following definitions for the term “form:” “1) take on a definite arrangement or 2) take up a formation next to.” Examiner’s Answer, page 6. It has further been asserted that the second of these definitions encompasses the bonding of a preformed structure next to something else. *See id.* No citation has been provided for this definition, or for the Examiner’s interpretation thereof.

It would appear from the Examiner’s interpretation of the second cited definition of the term “form” that the Examiner has focused completely upon the phrase “next to,” while overlooking the requirement of “tak[ing] up a formation.” It appears from the plain language of the cited definition that the term “form” means that the act of “formation” occurs “next to” something else, whereas the bonding of a preformed structure to something else (*e.g.*, the active surface of a substrate), does not amount to formation of the preformed structure next to something else.

Furthermore, the Examiner's interpretation of the verb "form" to include the act of bonding one object to another, is inconsistent with commonly accepted definitions for that term, a few examples of which follow:

—verb (used with object)

31. to construct or frame.
32. to make or produce.
33. to serve to make up; serve as; compose; constitute: *The remaining members will form the program committee.*
34. to place in order; arrange; organize.
35. to frame (ideas, opinions, etc.) in the mind.
36. to contract or develop (habits, friendships, etc.).
37. to give form or shape to; shape; fashion.
38. to give a particular form or shape to; fashion in a particular manner: *Form the dough into squares.*
39. to mold or develop by discipline or instructions: *The sergeant's job was to form boys into men.*
40. *Grammar.*
 - a. to make (a derivation) by some grammatical change: *The suffix "-ly" forms adverbs from adjectives.*
 - b. to have (a grammatical feature) represented in a particular shape: *English forms plurals in "-s".*
41. *Military.* to draw up in lines or in formation.

—verb (used without object)

42. to take or assume form.
43. to be formed or produced: *Ice began to form on the window.*
44. to take a particular form or arrangement: *The ice formed in patches across the window.*

form. Dictionary.com. *Dictionary.com Unabridged (v 1.0.1)*, Based on the Random House

Unabridged Dictionary, © Random House, Inc. 2006.

<http://dictionary.reference.com/search?q=form> (accessed: September 12, 2006).

It would appear from the foregoing definitions (at least those that are applicable in interpreting the possible scope of independent claim 17), that the act of bonding a preformed ring

or frame, or a *preformed support structure*, to the active surface of a substrate may be considered to be part of “forming” an assembly, but cannot be considered to comprise “forming a support structure on an active surface of the . . . substrate,” as would be required for Leedy to anticipate each and every element of independent claim 17. Therefore, it is respectfully submitted that the 35 U.S.C. § 102(b) rejection of independent claim 17 is improper

Claim 20, which depends from independent claim 17 and recites that the act of “forming” includes “forming a layer of packaging material,” is additionally allowable since Leedy neither expressly nor inherently describes “forming a layer of packaging material” on the active surface of a substrate. Rather, the description of Leedy is limited to forming an assembly that includes a substrate and preformed ring or frame by bonding the ring or frame to the substrate.

Reversal of the 35 U.S.C. § 102(b) rejections of claims 17-20 is respectfully solicited.

B. REJECTIONS UNDER 35 U.S.C. § 103(a)

3. ANALYSIS

a. LEEDY IN VIEW OF GRIGG

Claims 21-34 have been rejected under 35 U.S.C. § 103(a) for reciting subject matter which is purportedly unpatentable over the subject matter taught in Leedy, in view of teachings from Grigg.

Claims 21-34 are allowable, among other reasons, for depending directly or indirectly from independent claim 17, which is allowable.

In response to the assertion that the teachings of Leedy and Grigg have not been considered in combination, it is respectfully submitted that one of ordinary skill in the art

wouldn't have been motivated to consider the teachings of these references together, nor has the Examiner provided a convincing line of reasoning to the contrary.

It is respectfully requested that the 35 U.S.C. § 103(a) rejections of claims 21-34 be reversed.

XI. CONCLUSION

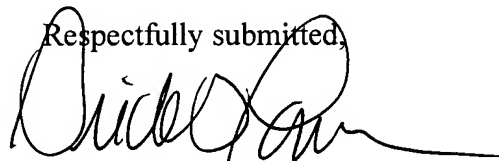
It is respectfully submitted that:

(A) The subject matter recited in claims 17-20 is novel and, thus, under 35 U.S.C. § 102(b), patentable over the subject matter described in Leedy;

(B) Claims 21-34 are drawn to subject matter that is non-obvious and, thus, under 35 U.S.C. § 103(a), patentable over the subject matter taught in Leedy, in view of teachings from Grigg.

Therefore, it is respectfully requested that the rejections of claims 17-34 be reversed and that each of these claims be allowed.

Respectfully submitted,



Brick G. Power
Registration No. 38,581
Attorney for Applicants
TRASKBRITT, PC
P.O. Box 2550
Salt Lake City, Utah 84110-2550
Telephone: 801-532-1922

Date: September 12, 2006
BGP/eg
Document in ProLaw